



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

December 30, 2016

Reply to: ECL-122

Delivered via Email

Kalle Godel
Montana-Dakota Utilities Company 400
North Fourth Street
Bismarck, ND 58501-4092 Dear

With this letter, the Environmental Protection Agency (EPA) is providing the final set of comments on the draft Remedial Investigation/Feasibility Study (RI/FS) Work Plan. The enclosed comments should be addressed in the final Work Plan, in addition the agreements reached in meetings between Cascade Natural Gas (Cascade) and EPA on August 18, 2016 and September 30, 2016.

With the receipt of this letter by Cascade, the 60 day period set forth in the Statement of Work for developing the final RI/FS Work Plan begins. Therefore, the final RI/FS Work Plan shall be submitted to EPA for approval no later than February 28, 2017. This deadline supersedes the 30 day final submittal date agreed to in our March 25, 2016 letter to you.

With (b) (6) please contact me Eva DeMaria with any questions. Eva can be reached at 206-553-1970 or demaria.eva@epa.gov.

Sincerely,

Remedial Project Manager

enclosure

BREMERTON-003461

Bremerton Gas Works Superfund Site
EPA Final Comments on Draft RI/FS Work Plan
December 30, 2016

In previous comments, EPA indicated that Donald Brown should be added to SQAPP signature pages. This was incorrect information. The EPA Regional Quality Assurance Manager does not need to provide a signature on SQAPPs developed by PRPs. Delete the signature line for Donald Brown in the Uplands and Marine SQAPPs.

Signature line for Donald Brown has been deleted.

Section 2.2 (Site Uses Prior to 1930) -The Suquamish Tribe government website indicates that ancestral Suquamish have lived in Central Puget Sound for approximately 10,000 years. Text needs to be revised to reflect this information.

Text has been updated as requested.

Human Populations and Land Use -Why is only the 2010 census being cited? According to the Suquamish Tribe government website there are 950 enrolled members with fishing and gathering rights in the project area. This information should be included in the Work Plan.

Information has been added as requested.

The revised draft Work Plan is reliant on the development of the COPC Screening Memorandum. Since the COPC Screening Memorandum will not be developed, the Work Plan should be revised to describe the process that will be used to identify COPCs.

Information has been added as requested in section 5.3.1

Risk Assessment and Risk Assessment Technical Memorandum -section 5.2.5 and 5.3 discuss tissue sampling as "contingent," "if warranted," and/or "if needed." During a meeting between Cascade and EPA/Suquamish Tribe on 5/11/16, tissue sampling was discussed and it was our understanding that tissue sampling was likely to be undertaken. It was our understanding that the details on how and when this would occur would be outlined in the Risk Assessment Technical Memorandum. This should be clarified in the Work Plan.

Additional clarification has been added in section 5.3.1

Risk Assessment Technical Memorandum (Section 5.3.2) -The discussion mentions reference areas, but does not describe how such areas will be determined. The Work Plan should describe either 1) how these areas will be determined, or 2) that these areas will be determined as the Risk Assessment Technical Memorandum is developed. In either case, there needs to be discussion with EPA and Tribe as to what sites may or may not be acceptable for inclusion and how data gathered will be used.

The bullet referencing background areas has been struck. As the extent of contamination is defined in the phase 1 studies, the scope of tissue collection program will be defined. This may include the collection of off-site tissues where applicable and in consultation with EPA and the Tribe.

Dioxin/Furan Sampling

In meetings held on August 18, 2016 and September 30, 2016, Cascade proposed the following methodology for addressing the potential for dioxins/furans to exist in upland soils and marine sediments:

Analyze all samples for PCBs, phenols and chlorinated pesticides. If any of those contaminants are detected, sample will be analyzed for dioxins/furans. This approach is proposed for upland soils and sediments.

EPA agrees to the proposed approach for upland soils. The evaluation of dioxins/furans in sediments is to be conducted as follows:

Augment the Cascade proposal with a minimum of 5 dioxin/furan samples collected and analyzed; at least 2 of the five representing "clean" samples (no screening hits). Clean samples should represent sediments of similar physical characteristics to those with positive screening results.

Similar to the VOC screening approach for sediments, EPA interprets implementation of this approach as follows: 1) if 7 samples have positive screening results, then a total of 9 samples would be analyzed (7 positives, 2 non-detects); 2) if 2 samples have positive screening results, then a total of 5 samples would be analyzed (2 positives, 3 non-detects); 3) if all screened samples are non-detects, 5 of those samples would be analyzed.

This approach has been incorporated into the work plan.

